



August 11, 2005

Arthur Neal  
Director, Program Administration  
National Organic Program  
USDA-AMS-TMO-NOP  
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So., Ag Stop 0268  
Washington, DC 20250

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**Reference:** National Organic Program, Sunset Review, Docket number TM-04-07

Dear Mr. Neal,

In response to your request for comments for the National Organic Program Sunset Review, please accept this request from the Natural Foods Group of Florida Crystals Food Corp. that the following substances continue to be allowed for use in certified organic handling and remain intact on the National List as originally approved.

<b>Substances:</b>	<b>Location on the National List:</b>
Calcium Hydroxide	Section 205.605(b)
Ascorbic Acid	Section 205.605(b)
Carbon Dioxide	Section 205.605(b)
Enzymes	Section 205.605(a)

We request these continuations for the following reasons:

1. Calcium Hydroxide, Ascorbic Acid, Carbon Dioxide and Enzymes have been determined by the National Organic Standards Board (NOSB) to be consistent with the Organic Foods Production Act (OFPA), its implementing regulations and criteria for substances allowed in organic production and handling.
2. Florida Crystals Food Corp. manufactures certified organic sugar and certified organic sugar and rice products and we are able to make those products because these substances are allowed for organic processing. Our business's success depends on large part on the consistent and continuous availability of organic sugar, sugar products and rice products.

3. Calcium Hydroxide is necessary in the purification of the freshly squeezed cane juice that is concentrated and crystallized to produce the organic sugar that is common in our diet and essential to the formulation, flavor and consistency of the products Florida Crystals Food Corp. produces and sells.

Ascorbic Acid and Enzymes are necessary for the processing of our sugar and rice syrup products, important as major ingredients to the organic food processing industry.

Carbon Dioxide is necessary for insect control in our rice storage facilities.

4. Florida Crystals Food Corp. uses Calcium Hydroxide, Ascorbic Acid and Enzymes in quantities that qualifies our products for their 95% and above "Certified Organic" status, allowing us to use the **USDA ORGANIC** seal on our labels, which our customers look for and trust.
5. Florida Crystals Food Corp. has determined that there are no viable alternatives to Calcium Hydroxide, Ascorbic Acid, Carbon Dioxide and Enzymes in the production of our products.
6. Florida Crystals Food Corp. understands that Calcium Hydroxide, Ascorbic Acid, Carbon Dioxide and Enzymes are produced today by the same methods used when they were first placed on the National List.
7. Currently, 50% of the annual sales of the Natural Foods Group of Florida Crystals Food Corp. is based on certified organic sugar and that percentage of sales is growing at over 20% a year.
8. Florida Crystals Food Corp. is in the process of tripling our organic sugar cane acreage, and since rice is our rotation crop, that acreage will triple as well, to meet the increased demand for certified organic sugar and to respond for the desire in the marketplace for domestically produced certified organic sugar and sugar and rice products.
9. Florida Crystals Food Corp. is aware of no reason why Calcium Hydroxide, Ascorbic Acid, Carbon Dioxide and Enzymes should not be allowed for use in certified organic handling and we confidently support their continued approval.

Thank you very much and please contact us for any additional information.

Sincerely,

**Michael DeLuca**  
**Vice President - Natural Foods Group**  
**Florida Crystals Food Corp.**

**One North Clematis Street, Suite 200, West Palm Beach, FL 33401**